

EXHIBIT C

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS)	
LIABILITY LITIGATION)	
)	
)	
)	
)	MDL No. 2419
THIS DOCUMENT RELATES TO:)	Dkt. No 1:13-md-2419 (RWZ)
)	
All Suits Against the Saint Thomas Entities)	
)	
)	
)	
)	

Notice to GDC Properties, LLC of 30(b)(6) Deposition

Defendants, Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network (collectively the “Saint Thomas Entities”), pursuant to Federal Rule of Civil Procedure 30(b)(6), come now and give notice that the oral and videotaped deposition of GDC Properties Management, LLC (“GDC”), as an organization, will be taken on the topics detailed below. GDC shall identify the person(s) who will speak on its behalf on each topic at least seven (7) days before the deposition(s).

The deposition will be taken on June 12, 2015, beginning at 9:00 a.m. (EDT) and continuing until completed. The deposition will take place at the offices of NUTTER McCLENNEN & FISH LLP, Seaport West, 155 Seaport Boulevard, Boston, Massachusetts 02210. The deposition will be recorded by stenographical means and by video.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), GDC’s designee(s) shall be prepared to testify regarding the following subjects:

1. The use of the property located at 687-705 Waverly Street, Framingham, Massachusetts, 01702 (hereafter “NECC Facility”), by any tenants since 2005;
2. The business relationship between GDC, NECC, Ameridose and any other affiliated or related company¹, including all documents reflecting the terms, conditions and scope of such relationship;
3. Identification of all employees, owners, managers or other representatives of GDC;
4. The employees, managers and executives of GDC, including chain of command and decision making authority;
5. The responsibility of GDC and each tenant at the NECC Facility with respect to maintenance and repairs to the premises;
6. Repairs, complaints, work orders, renovations or modifications performed at the NECC Facility;
7. The compounding of sterile drugs by NECC or Ameridose;
8. The cleanrooms operated by NECC and/or Ameridose, including without limitation cleaning and maintenance activities relating to same, whether or not performed by GDC;

¹ These include:

- 1 . Ameridose
2. Medical Sales Management
3. Medical Sales Management, SW
4. 203 Flanders Road, LLC
5. 205 Flanders Road, LLC
6. Alanus Pharmaceuticals
7. AMD
8. Cadden Family- 2012, LLC
9. Cardo Properties, LLC
10. Conigliaro Block, Inc.
11. Conigliaro Family Investments, LLC
12. Conigliaro Industries, Inc.
13. GDC Holdings, Inc.
14. GDC Properties Management, LLC
15. Hunter Holdings, LLC
16. L&S Creations, Inc.
17. MSM, Inc.
18. MSM SW, Inc.
19. Nationwide Foam, Inc.
20. Nationwide Recycling Sales Management, Inc.
21. Physicians Choice Medical Marketing, LLC
22. Stone House Realty Group, LLC.

9. All recycling activities (mattresses, foam, etc.) at or near the NECC Facility;
10. All testing done at the NECC Facility, including without limitation air quality, air pressure, air flow, cleanliness, contamination, or the like.
11. GDC's responses to the Saint Thomas Entities' discovery requests, including without limitation the documents produced in response;
12. Information known or available to GDC regarding the circumstances of the contamination of MPA at the NECC Facility, the outbreak of fungal meningitis across several states, and the closing of NECC and Ameridose; and
13. Documents produced by any party on the US Legal repository involving any GDC representative or employee, including without limitation Steve Higgins.

Respectfully submitted,

/s/ Adam T. Schramek

Sarah P. Kelly (BBO #664267)
skelly@nutter.com

NUTTER McCLENNEN & FISH LLP
Seaport West
155 Seaport Boulevard
Boston, Massachusetts 02210
(617) 439-2000
(617) 310-9461 (FAX)

Yvonne K. Puig*
Texas State Bar No. 16385400
yvonne.puig@nortonrosefulbright.com
Adam T. Schramek*
Texas State Bar No. 24033045
adam.schramek@nortonrosefulbright.com
Eric J. Hoffman*
Texas State Bar No. 24074427
eric.hoffman@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Blvd., Suite 1100
Austin, Texas 78701
(512) 536-2450
(512) 536-4598 (FAX)

Marcy Hogan Greer*
Texas State Bar No. 08417650
mgreer@adjtlaw.com

ALEXANDER DUBOSE JEFFERSON &
TOWNSEND LLP
515 Congress, Suite 2350
Austin, Texas 78701
(512) 482-9300
(512) 482-9303

*Appearing Pro Hac Vice

CERTIFICATE OF SERVICE

I certify that unless noted otherwise below, the foregoing was served by electronic mail on the 28th day of April, 2015.

Adam T. Schramek
Adam T. Schramek

<p>Alan M. Winchester Frederick H. Fern Harris Beach, PLLC 100 Wall Street New York, NY 10005</p> <p>Robert H. Gaynor John P. Ryan William J. Dailey , Jr. Sloane & Walsh LLP Three Center Plaza Boston, MA 02108 rgaynor@sloanewalsh.com wdaileyjr@sloanewalsh.com jryan@sloanewalsh.com</p> <p>Bruce A. Singal Callan G. Stein Michelle R. Peirce Donoghue, Barrett & Singal, PC Suite 1320 One Beacon Street Boston, MA 02108-3113 bsingal@dbslawfirm.com mpeirce@dbslawfirm.com cstein@dbslawfirm.com</p> <p><i>Counsel for the Caddens, Conigliaros and Chin</i></p>	<p>J. Gerard Stranch, IV Benjamin A. Gastel Branstetter, Stranch & Jennings PLLC 227 Second Avenue North Nashville, TN 37201 gerards@bsjfirm.com beng@bsjfirm.com</p> <p>Mark Zamora Mark Zamora and Associates 5 Concourse Parkway, Suite 2350 Atlanta, GA 30328 mark@markzamora.com</p> <p>Rick Ellis Ellis & Rapacki LLP 85 Merrimac Street Suite 500 Boston, MA 02114 rellis@ellisrapacki.com</p> <p>Mark P. Chalos Lieff Cabraser Heimann & Bernstein, LLP 150 Fourth Avenue North, Suite 1650 Nashville, TN 37219-2417 ecabraser@lchb.com mchalos@lchb.com</p> <p><i>Members of the Plaintiffs' Steering Committee</i></p>
---	---

<p>C.J. Gideon Chris Tardio Gideon, Cooper & Essary PLC 315 Deaderick St., Suite 1100 Nashville, TN 37238 cj@gideoncooper.com chris@gideoncooper.com</p>	<p>James Rehnquist Roberto M. Braceras Goodwin Procter, LLP Exchange Place 53 State Street Boston, MA 02109 jrehnquist@goodwinprocter.com rbraceras@goodwinprocter.com</p>
<p><i>Counsel for STOPNC</i></p>	<p><i>Counsel for UniFirst</i></p>
<p>Daniel Rabinovitz Nicki Samson Brady Hermann John Wells Michaels, Ward & Rabinovitz, LLP One Beacon Street 2nd Floor Boston, MA 02108 dmr@michaelsward.com ns@michaelsward.com bjh@michaelsward.com jkw@michaelsward.com</p>	<p>Joseph P. Thomas Joshua A. Klarfeld Ulmer & Berne LLP 600 Vine Street Suite 2800 Cincinnati, OH 45202 jthomas@ulmer.com jklarfeld@ulmer.com</p>
<p><i>Counsel for MSM</i></p>	<p>Robert A. Curley , Jr. Curley & Curley P.C. Suite 103 35 Braintree Hill Office Park Braintree, MA 02184 rac@curleylaw.com</p>
<p>Franklin H. Levy Lawson & Weitzen 88 Black Falcon Avenue Suite 345 Boston, MA 02210 flevy@gmail.com</p>	<p><i>Counsel for GDC</i> <i>By E-mail and U.S. Mail</i></p> <p>Matthew P. Moriarty Kimberly Langelier Tucker Ellis 950 Main Avenue, Suite 1100 Cleveland, OH 44113 matthew.moriarty@tuckerellis.com, kimberly.langelier@tuckerellis.com</p>
<p><i>Counsel for Alaunus</i></p>	
<p>Peter Hermes 265 Franklin Street, Seventh Floor Boston, MA 02110 phermes@hermesnetburn.com</p>	<p><i>Counsel for Ameridose</i></p>
<p><i>Counsel for Liberty</i></p>	